STIPULATED MOTION SETTING TRIAL DATES AND OTHER RELATED DATES – 1

Miller Nash LLP

605 5th Ave S | Suite 900 Seattle, WA 98104 206.624.8300 | Fax: 206.340.9599

The Honorable Marsha J. Pechman

## UNITED STATE DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

| IN RETHE APPLICATION OF DARREN SEAN HORTON, | ) No. 2:25-cv-01040-MJP   |
|---|---|
| Petitioner,                                 | <ul><li>STIPULATED MOTION SETTING TRIAL</li><li>DATES AND OTHER RELATED DATES</li></ul> |
| VS.   |   |
| JALIA NAMAZZI.                              |   |
| Respondent.                                 | _}  |

## **STIPULATION AND MOTION**

By and through the undersigned attorneys of Petitioner Darren Sean Horton ("Petitioner") and Respondent Jalia Namazzi (Respondent), pursuant to FRCP 6(b), FRCP 26(a)(2)(D)(ii), and FRCP 26(b), the parties hereby stipulate and jointly move the Court for an Order Setting Trial Dates and Related Dates as follows:

| Event                                  | Proposed Deadline |
|--|-------------------|
| FRCP 34 Requests for Production to be  | June 30, 2025     |
| issued                                 |                   |
| Discovery completed by                 | July 11, 2025     |
| FRCP 26(a)(2) disclosures completed by | July 18, 2025     |
| FRCP 30 Depositions to be completed by | July 24, 2025     |

| Rebuttal expert disclosures/reports completed    | July 31, 2025                     |
|--|-----------------------------------|
| by   |                                   |
| All parties to exchange and file witness lists,  | August 5, 2025                    |
| exhibit lists, exhibits, and trial briefing with |                                   |
| the Court  |                                   |
| All parties to file (1) objections to witnesses  | August 8, 2025                    |
| and exhibits and (2) all motions in limine with  |                                   |
| the Court  |                                   |
| All parties to file replies to objections and    | August 12, 2025                   |
| motions in limine with the Court                 |                                   |
| Pretrial Conference                              | August 14, 2025 at 1:30 PM        |
| BENCH TRIAL SET FOR 9:00 A.M. on                 | August 18, 2025 – August 20, 2025 |
| (1-3 day duration)                               |                                   |

DATED this 27th day of June, 2025.

Presented By:

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/s/ J. Dino Vasquez
J. Dino Vasquez, WSBA# 25533

/s/ Jakini Auset S. Ingram
Jakini Auset S. Ingram, WSBA# 61521 22

23 MILLER NASH LLP

605 5th Ave S. Ste 900

24 Seattle, WA 98104

Telephone: 206-624-8300 Facsimile: 206-340-9599

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Email: dino.vasquez@millernash.com Email: jakini.ingram@millernash.com

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4899-6644-6417.1

| 1  | Attorneys for Petitioner   |                         |
|--|--|-------------------------|
| 2  | Presented By:  |                         |
| 3  | DUBOIS LEVIAS LAW GROUP, PLLC  |                         |
| 4  | 151 Biretti Berttis  |                         |
| 5  | Lucia Levias, WSBA# 39324  |                         |
| 6  | DUBOIS LEVIAS LAW GROUP, PLLC  |                         |
| 7  | 7 927 N Northlake Way, Suite 140<br>Seattle, WA 98103  |                         |
| 8  | Telephone: 206-547-1486  |                         |
| 9  |  |                         |
| 0  | Cc: kimberly@duboislaw.net   |                         |
| 1  | Attorneys for Respondent Jalia Namazzi   |                         |
| 2  |  |                         |
| 13   | Presented By: BUCKLEY LAW PC   |                         |
|  |  |                         |
| 4  | 4 /s/ Katrina Seipel, OSB# 164793  | Dated: 6/27/2025        |
|  | Katrina Anne Seipel, pro hac vice  | Dated: 6/27/2025        |
| 15   | Katrina Anne Seipel, <i>pro hac vice</i> Katelyn Skinner, <i>pro hac vice</i>  | Dated: 6/27/2025        |
| 15   | Katrina Anne Seipel, <i>pro hac vice</i> Katelyn Skinner, <i>pro hac vice</i> BUCKLEY LAW PC   | Dated: 6/27/2025        |
| 15   | Katrina Anne Seipel, <i>OSB#</i> 104793  Katrina Anne Seipel, <i>pro hac vice</i> Katelyn Skinner, <i>pro hac vice</i> BUCKLEY LAW PC  5300 Meadows Road, Suite 200  Lake Oswego, OR 97205   | <u>Dated: 6/27/2025</u> |
| 15<br>16<br>17<br>18                               | Katrina Anne Seipel, <i>pro hac vice</i> Katelyn Skinner, <i>pro hac vice</i> BUCKLEY LAW PC 5300 Meadows Road, Suite 200 Lake Oswego, OR 97205 Telephone: 503-620-8900 Fax: 503-620-4878  | Dated: 6/27/2025        |
| 15<br>16<br>17<br>18                               | Katrina Anne Seipel, pro hac vice Katelyn Skinner, pro hac vice  BUCKLEY LAW PC 5300 Meadows Road, Suite 200 Lake Oswego, OR 97205 Telephone: 503-620-8900 Fax: 503-620-4878 Email: kds@buckley-law.com  | Dated: 6/27/2025        |
| 15<br>16<br>17<br>18<br>19<br>20                   | Katrina Anne Seipel, pro hac vice Katelyn Skinner, pro hac vice  BUCKLEY LAW PC 5300 Meadows Road, Suite 200 Lake Oswego, OR 97205 Telephone: 503-620-8900 Fax: 503-620-4878 Email: kds@buckley-law.com Email: kas@buckley-law.com PRO HAC VICE                        | Dated: 6/27/2025        |
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**ORDER** Based on the above Stipulated Motion Setting Dates and Other Related Dates, it is so 3 ordered. 5 DATED this 30th day of June, 2025. 6 Marshy Melens 9 MARSHA J. PECHMAN UNITED STATES SENIOR DISTRICT JUDGE 10 11 12 Presented by: **Copy received; Notice of Presentation** Waived; Approved as to Form: 13 14 MILLER NASH LLP DUBOIS LEVIAS LAW GROUP PLLC 15 16 By /s/ Jakini Auset S. Ingram By /s/ Lucia Levias J. Dino Vaquez, WSBA# 25533 Lucia Levias, WSBA# 39324 17 Jakini Auset S. Ingram, WSBA# 61521 18 Attorneys for Petitioner Darren Sean Horton Attorneys for Respondent Jalia Namazzi 19 20 **BUCKLEY LAW PC** 21 22 By /s/ Katrina Seipel, OSB 164793 Katelyn Skinner, pro hac vice 23 Katrina Anne Seipel, pro hac vice 24 Attorneys for Respondent Jalia Namazzi 25 Dated: 6/27/2025 26

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